FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Michael Mercer, Treasurer
Credit Union Legislative Action
Council of CUNA
PO Box 576
Washington, DC 20044

DEC 1 1999

Identification Number: C00007880

Reference: April Monthly Report (3/1/99-3/31/99), May Monthly Report (4/1/99-4/30/99) and September Monthly Report (8/1/99-8/31/99)

Dear Mr. Mercer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses what appear to be in-kind contributions made on behalf of several federal candidates where the original payments for the goods and services have been made by individuals and entities other than your committee (pertinent portions(s) attached). Please explain the circumstances surrounding these transactions.

Also, be advised that the payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee, is a contribution. 11 CFR§116.5(b) Note, these transactions may affect the aforementioned individuals' and entities' contribution limitations to those candidates.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our

toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A. L. Kitchen

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

99034450256

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (In Full)
Credit Union Legislative Action Council of CUNA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Congressional Campaign Cmte. 430 South Capitol St., SE Washington, DC 20003	Annual Dinner & 1999 Dues - Speakers Club Disbursement for: [ ] Primary [ ] General [ ] Other (specify) 1999	03/02/99	15,000.00
B. Full Name, Mailing Address and ZIP Code Earl Pomeroy For Congress P.O. Box 746 Bismarck, ND 58502	Purpose of Disbursement: Earl Pomeroy, U.S. HOUSE AL ND Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/02/99	500.00
C. Full Name, Mailing Address and ZIP Code Friends Of Lane Evans Committee P.O. Box 5263 Rock Island, IL 61204	Purpose of Disbursement: Lane Evans, U.S. HOUSE 17th IL Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/02/99	500.00
D. Full Name, Mailing Address and ZIP Code Biggert for Congress PO Box 837 Hinsdale, IL 60522	Purpose of Disbursement: Judy Biggert, U.S. HOUSE 13th IL Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/02/99	500.00
E. Full Name, Mailing Address and ZIP Code Alaskans For Don Young Post Office Box 100-298 Anchorage, AK 99510	Purpose of Disbursement: Don Young, U.S. HOUSE AL AK Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/02/99	1,000.00
F. Full Name, Mailing Address and ZIP Code Dan Burton For Congress Cmte. P.O. Box 50593 Indianapolis, IN 46250	Purpose of Disbursement: Dan Burton, U.S. HOUSE 6th IN Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/02/99	1,000.00
G. Full Name, Mailing Address and ZIP Code Gary Condit For Congress 300 Capitol Mall Suite 300 Sacramento, CA 95814	Purpose of Disbursement: Gary Condit, U.S. HOUSE 18th CA Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/04/99	500.00
H. Full Name, Mailing Address and ZIP Code Carl Parks 805 15th Street, N.W. Suite 300 Washington, DC 20005-2207	Purpose of Disbursement: Reimb. of personal adv. for 3/4/99 breakfast Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/04/99	310.00 (In-Kind)
I. Full Name, Mailing Address and ZIP Code Hastert For Congress Committee P.O. Box 628 Batavia, IL 60510	Purpose of Disbursement: Reimb. of personal adv. for 3/4/99 breakfast Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	03/04/99	310.00 (Memo In-Kind)

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SUBTOTAL of Disbursements This Page (optional)	19,310.00
TOTAL This Period (last page this line number only)	

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SCHEDULE B — **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)
Credit Union Legislative Action Council of CUNA

AX

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Chris Kerecman 2350 South Gary Avenue Pomona, CA 91766	Reimb. of personal adv. - 2/22/99 Fundraiser Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	04/01/99	1,244.80 (In-Kind)
B. Full Name, Mailing Address and ZIP Code Lucille Roybal-allard For Congres 6414 Rugby Avenue Huntington Park, CA 90255	Purpose of Disbursement Reimb. of personal adv. - 2/22/99 Fundraiser Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	Amount of Each Disbursement This Period 1,244.80 (Memo In-Kind)
C. Full Name, Mailing Address and ZIP Code California Credit Union Leage 2350 S. Garey Ave Pomona, CA 91766	Purpose of Disbursement Reimb. for 2/22/99 Fundraiser expenses Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	AX Amount of Each Disbursement This Period 469.75 (In-Kind)
D. Full Name, Mailing Address and ZIP Code Lucille Roybal-allard For Congres 6414 Rugby Avenue Huntington Park, CA 90255	Purpose of Disbursement Reimb. for 2/22/99 Fundraiser expenses Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	Amount of Each Disbursement This Period 469.75 (Memo In-Kind)
E. Full Name, Mailing Address and ZIP Code California Credit Union Leage 2350 S. Garey Ave Pomona, CA 91766	Purpose of Disbursement Reimb. for 2/23/99 Fundraiser expenses Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	AX Amount of Each Disbursement This Period 84.50 (In-Kind)
F. Full Name, Mailing Address and ZIP Code Gibbons for Congress Committee 4655 Aircentre Circle Reno, NV 89502	Purpose of Disbursement Reimb. for 2/23/99 Fundraiser expenses Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	Amount of Each Disbursement This Period 84.50 (Memo In-Kind)
G. Full Name, Mailing Address and ZIP Code Chris Kerecman 2350 South Gary Avenue Pomona, CA 91766	Purpose of Disbursement Reimb. of personal adv. - 2/23/99 Fundraiser Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	AX Amount of Each Disbursement This Period 576.00 (In-Kind)
H. Full Name, Mailing Address and ZIP Code Gibbons for Congress Committee 4655 Aircentre Circle Reno, NV 89502	Purpose of Disbursement Reimb. of personal adv. - 2/23/99 Fundraiser Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/01/99	Amount of Each Disbursement This Period 576.00 (Memo In-Kind)
I. Full Name, Mailing Address and ZIP Code Pease for Congress Committee PO Box 611 Seelyville, IN 47878	Purpose of Disbursement Edward Pease, U.S. HOUSE 7th IN Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 04/02/99	Amount of Each Disbursement This Period 1,000.00

SUBTOTAL of Disbursements This Page (optional) — 3,375.05

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)
Credit Union Legislative Action Council of CUNA

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Lazio For Congress 72 East Main St., Suite 4 c/o Piccirillo Reinfurt & Lamont LLP Babylon, NY 11702	Rick Lazio, U.S. HOUSE 2nd NY [X] Primary [ ] General [ ] Other (specify) 2000	06/06/99	2,500.00
B. Quinn for Congress P.O. Box 2012 Blasdell, NY 14219	Jack Quinn, U.S. HOUSE 30th NY [X] Primary [ ] General [ ] Other (specify) 2000	06/06/99	300.00
C. Andrews For Congress 215 Forth Avenue Suite 200 Haddon Heights, NJ 08035	Robert E. Andrews, U.S. HOUSE 1st NJ [X] Primary [ ] General [ ] Other (specify) 2000	06/06/99	1,000.00
D. John Sweeney for Congress PO Box 4137 Clifton Park, NY 12065	John Sweeney, U.S. HOUSE 22nd NY [X] Primary [ ] General [ ] Other (specify) 2000	06/06/99	500.00
E. Committee to Re-Elect Congressman Towns 350 Clinton Avenue #6R Brooklyn, NY 11238	Ed Towns, U.S. HOUSE 10th NY [X] Primary [ ] General [ ] Other (specify) 2000	06/06/99	500.00
F. People For English P.O. Box 1940 Erie, PA 16507	Phil English, U.S. HOUSE 21st PA [X] Primary [ ] General [ ] Other (specify) 2000	06/10/99	1,000.00
G. Souder for Congress, Inc. 712 North Main Street Box 400 Auburn, IN 46706	Mark Souder, U.S. HOUSE 4th IN [X] Primary [ ] General [ ] Other (specify) 2000	06/10/99	600.00
H. Charles A Gonzalez Congressional Campaign 134 Schreiner Place San Antonio, TX 78212	CHARLES GONZALEZ, U.S. HOUSE 20th TX [X] Primary [ ] General [ ] Other (specify) 2000	06/10/99	500.00
I. Karen Ward 705 Mapleton Road Rockville, MD 20850	In-kind for 7-29-99 Luncheon at Barolo [X] Primary [ ] General [ ] Other (specify) 2000	06/11/99	186.73 (In-Kind)

SUBTOTAL of Disbursements This Page (optional) 7,086.73

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. People For English P.O. Box 1940 Erie, PA 16507	In-kind for 7-29-99 luncheon at Barolo [X] Primary [ ] General [ ] Other (specify) 2000	08/11/99	186.73 (Memo In-Kind)
B. Gary Condit For Congress 300 Capitol Mall Suite 300 Sacramento, CA 95814	Gary Condit, U.S. HOUSE 18th CA [X] Primary [ ] General [ ] Other (specify) 2000	08/16/99	1,000.00
C. Walden for Congress PO Box 360 Hood River, OR 97031	Greg Walden, U.S. HOUSE 2nd OR [X] Primary [ ] General [ ] Other (specify) 2000	08/16/99	1,000.00
D. Bob Ney for Congress P.O. Box 490 St Clairsville, OH 43950	Bob Ney, U.S. HOUSE 18th OH [X] Primary [ ] General [ ] Other (specify) 2000	08/16/99	500.00
E. Friends Of Ray Lahood 3311 N. Sterling Ave Suite 10 Peoria, IL 61604	Ray Lahood, U.S. HOUSE 18th IL [X] Primary [ ] General [ ] Other (specify) 2000	08/16/99	350.00
F. Bob Riley For Congress 203 East 1ST Avenue P O Box 700 Ashland, AL 36251	Bob Riley, U.S. HOUSE 3rd AL [X] Primary [ ] General [ ] Other (specify) 2000	08/16/99	1,000.00
G. Wooisey For Congress P.o. Box 750176 Petaluma, CA 94975	Lynn Woolsey, U.S. HOUSE 6th CA [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	2,000.00
H. Abercrombie for Congress 1357 Kapiolani Blvd. Suite 1005 % McCarthy Honolulu, HI 96814	Neil Abercrombie, U.S. HOUSE 1st HI [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	500.00
I. Patsy T. Mink Campaign Cmte. 1946 Paula Drive Honolulu, HI 96816	Patsy Mink, U.S. HOUSE 2nd HI [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	500.00

SUBTOTAL of Disbursements This Page (optional) 6,850.00

TOTAL This Period (last page this line number only) .....

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NAME OF COMMITTEE (In Full)
Credit Union Legislative Action Council of CUNA

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Daniel Akaka For Us Senate P.o. Box 3169 Honolulu, HI 96802	Dan Akaka, U.S. SENATE HI [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	700.00
B. Bob Goodlatte For Congress 22 Church Ave, SW P.O. Box 292 Roanoke, VA 24002	Bob Goodlatte, U.S. HOUSE 6th VA [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	1,000.00
C. Hoosiers Supporting Buyer for Congress P.O. Box 713 204 A North Main Street Monticello, IN 47960	Steve Buyer, U.S. HOUSE 6th IN [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	1,000.00
D. Asa Hutchinson for Congress P.O. Box 2222 Fort Smith, AZ 72902	Asa Hutchinson, U.S. HOUSE 3rd AR [X] Primary [ ] General [ ] Other (specify) 2000	08/23/99	1,000.00
E. Pickett for Congress P.O. Box 2127 Virginia Beach, VA 23462	Owen Pickett, U.S. HOUSE 2nd VA [X] Primary [ ] General [ ] Other (specify) 2000	08/26/99	500.00
F. David Vitter for Congress LA	David Vitter, U.S. HOUSE 1th LA [ ] Primary [ ] General [X] Other (specify) Special 1999	08/27/99	1,000.00
G. LaTourette for Congress Committee 1004 Millridge Rd. Highland Hts, OH 44143	Steve LaTourette, U.S. HOUSE 19th OH [X] Primary [ ] General [ ] Other (specify) 2000	08/30/99	500.00
H. Bill Nelson for U.S. Senate PO Box 10962 Tallahassee, FL 32302	Bill Nelson, U.S. SENATE FL [X] Primary [ ] General [ ] Other (specify) 2000	08/30/99	4,753.00
I. Wendell "Buck" Sebastian GTE Federal Credit Union 711 South Dale Mabry Tampa, FL 33609	Paid for food for 8/23 breakfast event [X] Primary [ ] General [ ] Other (specify) 2000	08/30/99	207.00 (In-Kind)

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SUBTOTAL of Disbursements This Page (optional) — 10,700.00

TOTAL This Period (last page this line number only) —

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NAME OF COMMITTEE (In Full)
Credit Union Legislative Action Council of CUNA

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Bill Nelson for U.S. Senate PO Box 10962 Tallahassee, FL 32302	Paid for food for 8/23 breakfast event [X] Primary [ ] General [ ] Other (specify) 2000	08/30/99	207.00 (Memo In-Kind)
B. Jim Ryun for Congress 4006 SW Huntoon Topeka, KS 66604	Jim Ryun, U.S. HOUSE 2nd KS [X] Primary [ ] General [ ] Other (specify) 2000	08/30/99	1,000.00
C. Jim Ryun for Congress 4006 SW Huntoon Topeka, KS 66604	Voided Check [X] Primary [ ] General [ ] Other (specify) 2000	08/31/99	-600.00
D.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I.	Purpose of Disbursement [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	600.00
TOTAL This Period (last page this line number only)	25,136.73

6-00178